



Phillips Lytle LLP

Via ECF

November 15, 2018

Honorable John G. Koeltl
United States District Court
Southern District of New York
50 Pearl St., Courtroom 14A
New York, NY 10007-1312

Re: Eastern Profit Corporation Limited v. Strategic Vision US, LLC,
Civil Action No. 18-cv-2185

Dear Judge Koeltl:

We represent defendant-counterclaim plaintiff, Strategic Vision US, LLC ("Strategic Vision"), in the above-referenced matter. We respectfully request an extension of the deadline to complete discovery in this matter to February 28, 2019. The deadline is currently set as December 28, 2018 (*see* ECF Doc. No. 42.) With the addition of Guo Wengui ("Mr. Guo") as a counterclaim defendant and his likely motion to dismiss (which will not be fully briefed until January 14, 2019), we respectfully submit that additional time is necessary to complete discovery.

This is the first request to extend the deadline to complete discovery. Counsel for plaintiff and Mr. Guo each consent to this request. In accordance with Your Honor's Individual Practices, enclosed is a proposed revised scheduling order, which takes into account the proposed extended discovery deadline.

Respectfully submitted,

Phillips Lytle LLP

By /s/ Heather H. Kidera

Heather H. Kidera

cc: Counsel of Record (by ECF)
Enclosure
Doc #05-51420

ATTORNEYS AT LAW